

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Todd A. Brunner and
Sharon Y. Brunner,

Case No. 11-29064
Chapter 11

Debtors.

**SUPPLEMENTAL APPLICATION TO APPOINT THE LAW OFFICES OF
JONATHAN V. GOODMAN AS COUNSEL UNDER
GENERAL RETAINER FOR THE DEBTORS**

This is a supplemental application of the Debtors, Todd A. Brunner and Sharon Y. Brunner to put in an Order authorizing the employment of the Law Offices of Jonathan V. Goodman as counsel under general retainer under the terms and conditions described in the original application and this application.

1. The Debtors filed a *Petition* for Relief under Chapter 11 of Title 11, United States Code on June 5, 2011, and are operating their business as the Debtors-in-Possession.
2. The following are the amounts that Debtors' counsel has received pre-petition:
 - a. On or about March 6, 2011, \$5,000.00 from a check drawn from an account of Outer Limits Investments LLC. (this is from memory, as copy of check has not been found).
 - b. On or about March 20, 2011, \$18,900.00 from a check from Mr. Brunner.
 - c. On or about April 11, 2011, \$25,000.00 from a check from Guardian Investment Real Estate, from funds of Mr. Brunner.

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d. On or about April 20, 2011, \$10,000.00 from a check from Mr. Brunner.

e. On or about May 20, 2011, \$15,000.00 from a check from Guardian Investment Real Estate from funds of Mr. Brunner.

f. On or about June 1, 2011, \$10,000.00 from a check from Mr. Brunner.

The final check for \$10,000.00 is in counsel's trust account. All other payments were applied to fees and expenses incurred by counsel pre-petition. There is a small amount of pre-petition fees owed counsel, but such fees are waived.

3. As far as the predicted fees and expenses incurred, the original application estimated \$80,000.00 for preparation of schedules and other legal matters. Already, the Debtors have incurred attorney's fees of approximately \$10,000.00, just to obtain insurance coverage. Counsel estimates that negotiations for use of cash collateral will involve \$40,000.00 in fees; administrative matters, such as appearing at the first meeting of creditors, debtors' conference, and other similar matters, \$10,000.00; and other compliance with U.S. Trustee requirements, and final preparation of schedules, \$20,000.00.

The estimate of \$25,000.00 for preparation of monthly operating reports and assisting the Debtors with their duties will be incurred in order to make sure that the accountant properly prepares the monthly operating reports, making sure the Debtors continue to comply otherwise with Chapter 11 operating requirements, assistance in preparation of past due tax returns, representation in an ongoing audit by the Internal Revenue Service and work involved in obtaining relief from pre-petition judgments are all involved in the \$25,000.00 estimate.

4. The last estimate for \$45,000.00 on other miscellaneous matters is concerned with potential preference and other avoidance actions for pre-petition activities of the Debtors. There will be substantial work involved in insuring that the Debtors make whatever payments they are

required to make to the various creditors post-confirmation, as well as potential objection to certain claims.

WHEREFORE with this information, it is prayed that the Court render the Order appointing the Law Offices of Jonathan V. Goodman as counsel to the Debtors under general retainer.

Dated this 6th day of July, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN
Attorneys for Debtors

/s/ Jonathan V. Goodman
Jonathan V. Goodman

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